

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

In the Matter of:

INDUSTRIAL WASTE PROCESSING, FRESNO  
CALIFORNIA, SITE NUMBER CAD980736284

AMERICAN NATIONAL CAN COMPANY;  
ATLANTIC RICHFIELD COMPANY;  
CHEVRON U.S.A. INC.; CONTINENTAL  
CAN COMPANY, INC., represented by  
CROWN BEVERAGE PACKAGING, INC.;  
THE DOW CHEMICAL COMPANY; MOBIL OIL  
CORPORATION; NL INDUSTRIES, INC.  
PACIFIC GAS & ELECTRIC COMPANY  
SHELL OIL COMPANY; SOUTHERN  
CALIFORNIA GAS COMPANY;  
TEXACO, INC.; and TRI-VALLEY GROWERS,

RESPONDENTS.

Proceeding Under Section 122(h)(1)  
of the Comprehensive Environmental  
Response, Compensation and Liability  
Act of 1980 (42 U.S.C. §9622(h)(1))  
as amended by the Superfund  
Amendments and Reauthorization  
Act of 1986

U.S. EPA Docket  
No. 93-11

ADMINISTRATIVE ORDER  
ON CONSENT FOR  
PAYMENT OF PAST COSTS

This Order is issued by the United States Environmental  
Protection Agency ("EPA") and is agreed to by American National  
Can Company; Atlantic Richfield Company; Chevron U.S.A. Inc.;  
Continental Can Company, Inc., represented by Crown Beverage  
Packaging, Inc.; The Dow Chemical Company; Mobil Oil Corporation;  
NL Industries, Inc.; Pacific Gas & Electric Company; Shell Oil  
Company; Southern California Gas Company; Texaco, Inc; and Tri-  
Valley Growers ("Respondents"). The purpose of this Order is  
for EPA to recover response costs incurred through January 31,  
1993, by the United States at or in connection with the  
Industrial Waste Processing ("IWP") Superfund Site located at

1 7140 North Harrison Street in Fresno, Fresno County, California  
2 ("the Site"), and to resolve the alleged liability of the  
3 Respondents for such response costs.

4 EPA is authorized to enter into this Order pursuant to the  
5 authority vested in the Administrator of the EPA by Section  
6 122(h)(1) of the Comprehensive Environmental Response,  
7 Compensation, and Liability Act of 1980, as amended by the  
8 Superfund Amendments and Reauthorization Act of 1986, Pub. L. No.  
9 99-499 ("CERCLA"), which authority has been delegated to the  
10 Regional Administrators of the EPA by EPA Delegation No. 14-14-D  
11 (Sept. 13, 1987), and redelegated to the Director, Hazardous  
12 Waste Management Division, EPA Region IX.

13 WHEREAS, EPA alleges that hazardous substances as defined by  
14 Section 101(14) of CERCLA, 42 U.S.C. section 9601(14), have been  
15 or are threatened to be released into the environment from the  
16 Site;

17 WHEREAS, EPA alleges that the Site is part of a "facility"  
18 as defined in Section 101(9) of CERCLA, 42 U.S.C. section 9601(9)  
19 ("the Facility");

20 WHEREAS, EPA alleges that such releases or threatened  
21 releases required response action to be undertaken at the  
22 Facility pursuant to Section 104 of CERCLA, 42 U.S.C. section  
23 9604, and may require further response action to be undertaken in  
24 the future;

25 WHEREAS, EPA alleges that in performing this response  
26 action, it has incurred response costs at or in connection with  
27 the Facility totalling not less than \$1,370,000 as of January 31,

1 1993, and that interest has accrued and is continuing to accrue  
2 on the unpaid principal balance at the rate specified for  
3 interest on investments of the Hazardous Substance Superfund  
4 established under subchapter A of chapter 98 of Title 26, United  
5 States Code;

6 WHEREAS, EPA alleges that the Respondents are responsible  
7 parties pursuant to Section 107(a) of CERCLA, 42 U.S.C. section  
8 9607(a), and are jointly and severally liable for response costs  
9 incurred and to be incurred at or in connection with the  
10 Facility;

11 WHEREAS, the Attorney General or his designee has issued  
12 prior written approval of the settlement embodied in this Order  
13 pursuant to Section 122(h)(1) of CERCLA, 42 U.S.C. section  
14 9622(h)(1); and

15 WHEREAS, EPA and the Respondents desire to settle certain  
16 claims arising from the Respondents' alleged involvement with the  
17 Facility without litigation and without the admission or  
18 adjudication of any issue of fact or law or any admission of  
19 liability;

20 NOW, THEREFORE, in consideration of the above recitals and  
21 the promises herein, and intending to be legally bound hereby, it  
22 is ordered and agreed as follows:

23 1. This Order shall be binding upon EPA and shall be  
24 binding upon the Respondents and their successors and assigns.  
25 Each signatory to this Order represents that he or she is fully  
26 authorized to enter into the terms and conditions of this Order  
27 and to bind legally the party represented by him or her. The

1 Respondents agree to undertake all actions required by this  
2 Order. The Respondents consent to the issuance of this Order and  
3 will not contest EPA's authority to enter into this Order or to  
4 implement or enforce its terms.

5 2. The Respondents agree to pay to the Hazardous Substance  
6 Superfund \$1,370,000 within 45 days of the effective date of this  
7 Order, in full satisfaction of Respondents' alleged liability for  
8 the response costs, including accrued interest, incurred at or in  
9 connection with the Facility through January 31, 1993. If this  
10 sum has not been paid within 45 days of the effective date of  
11 this Order, interest thereon shall begin to accrue on the 46th  
12 day after the effective date of this Order and shall continue  
13 until payment has been made. The interest rate is the rate of  
14 interest on investments for the Hazardous Substances Superfund in  
15 section 107(a) of CERCLA.

16 3. The Respondents' payment shall be made by certified or  
17 cashier's check made payable to "EPA-Hazardous Substance  
18 Superfund." The checks shall reference the site name, address,  
19 and identification number, and the EPA docket number for this  
20 action and shall be sent by the Respondents to:

21 EPA Region IX  
22 ATTN: Superfund Accounting  
23 P.O. Box 360863M  
24 Pittsburgh, PA 15251  
25  
26  
27  
28

1 4. The Respondents shall simultaneously send a copy of  
2 their checks to:

3 Greg Baker, H-6-2  
4 U.S. Environmental Protection Agency, Region IX  
5 75 Hawthorne Street  
6 San Francisco, CA 94105

7 5. In addition to any other remedies or sanctions available  
8 to EPA, any Respondent who fails or refuses to comply with any  
9 term or condition of this Order shall be subject to enforcement  
10 action pursuant to Section 122(h)(3) of CERCLA, 42 U.S.C.  
11 § 9622(h)(3), and to civil penalties pursuant to Sections 122(1)  
12 and 109 of CERCLA, 42 U.S.C. §§ 9622(1) and 9609. The  
13 Respondents may submit their payments by one or more checks, but  
14 they are jointly and severally liable for payment of all amounts  
15 due under this Order.

16 6. This Order sets forth and governs Respondents'  
17 obligations to pay the United States' response costs incurred at  
18 or in connection with the Facility through January 31, 1993.  
19 Respondents' obligations to pay the United States' response  
20 costs, including accrued interest, incurred at or in connection  
21 with the Facility after January 31, 1993, are set forth in and  
22 are governed by the Administrative Order on Consent for Remedial  
23 Investigation/Feasibility Study (Operable Unit for Soils), which  
24 EPA and the Respondents are entering into in conjunction  
25 herewith.

26 7. Subject to paragraph 8 of this Order, upon payment of  
27 the amount specified in paragraph 2 of this Order, EPA agrees  
28 that the Respondents shall have resolved any and all civil

1 liability to EPA under Section 107(a) of CERCLA, 42 U.S.C.  
2 section 9607(a), for reimbursement of EPA response costs incurred  
3 at or in connection with the Facility as of January 31, 1993.

4 8. Nothing in this Order is intended to be nor shall it be  
5 construed as a release, covenant not to sue, or compromise of any  
6 claim or cause of action, administrative or judicial, civil or  
7 criminal, past or future, in law or in equity, which EPA may have  
8 against any of the Respondents for:

9 a) any liability as a result of failure to make the  
10 payment required by paragraph 2 of this Order or other failure to  
11 comply with terms of this Order; or

12 b) any liability not expressly included in paragraph 7  
13 above, including, without limitation any liability for i)  
14 injunctive relief at the Facility; ii) response costs incurred at  
15 or in connection with the Facility after January 31, 1993; iii)  
16 damages for injury to or loss or destruction of natural  
17 resources; or iv) any criminal liability.

18 9. Nothing in this Order is intended to be nor shall it be  
19 construed as a release, covenant not to sue, or compromise of any  
20 claim or cause of action, administrative or judicial, civil or  
21 criminal, past or future, in law or in equity, which EPA may have  
22 against any person, firm, corporation or other entity not a  
23 signatory to this Order.

24 10. The Respondents agree not to assert any claims or  
25 causes of action against the United States or the Hazardous  
26 Substance Superfund arising out of response activities undertaken  
27 at, or relating in any way to, the Facility, or to seek any other  
28

1 costs, damages, or attorney's fees from the United States, its  
2 agencies, employees or contractors arising out of response  
3 activities undertaken at, or relating in any way to, the  
4 Facility. The Respondents waive any right it might have to seek  
5 reimbursement from EPA pursuant to Section 106 of CERCLA, 42  
6 U.S.C. section 9606, for any costs pertaining to the Facility.  
7 This waiver is limited to costs incurred through the effective  
8 date of this Order and future costs incurred in conducting the  
9 Remedial Investigation/Feasibility Study (Operable Unit for  
10 Soils).

11 11. With regard to claims for contribution against the  
12 Respondents for matters addressed in this Order, the parties  
13 hereto agree that the Respondents are entitled, as of the  
14 effective date of this Order, to such protection from  
15 contribution actions or claims as is provided in Section  
16 122(h)(4) of CERCLA.

17 12. This Order shall be subject to a thirty-day public  
18 comment period pursuant to Section 122(i) of CERCLA. In  
19 accordance with Section 122(i)(3) of CERCLA, EPA may modify or  
20 withdraw its consent to this Order if comments received disclose  
21 facts or considerations which indicate that this Order is  
22 inappropriate, improper or inadequate.

23 13. The effective date of this Order shall be the date upon  
24 which EPA issues written notice to the Respondents that the  
25 public comment period pursuant to paragraph 12 of this Order has  
26 closed and that comments received, if any, do not require  
27 modification of or EPA withdrawal from this Order. Such written  
28

1 notice to the Respondents shall be sent to the following address:  
2 James Meeder, Esq., Beveridge & Diamond, One Sansome Street,  
3 Suite 3400, San Francisco, CA 94104.

4 14. This Order may be executed and delivered in any number  
5 of counterparts, each of which, when executed and delivered,  
6 shall be deemed to be an original, but such counterparts shall  
7 together constitute one and the same document.

8 IT IS SO AGREED:

9 AMERICAN NATIONAL CAN COMPANY

10

11 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
12 Name:  
13 Title:

13

ATLANTIC RICHFIELD COMPANY

14

15

16 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
17 Name:  
18 Title:

17

18 CHEVRON U.S.A. INC.

19

20 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
21 Name:  
22 Title:

22

23 CONTINENTAL CAN COMPANY, INC.  
24 represented by CROWN BEVERAGE PACKAGING, INC.

24

25 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
26 Name:  
27 Title:

27

28



1 notice to the Respondents shall be sent to the following address:

2 James Meeder, Esq., Beveridge & Diamond, One Sansome Street,

3 Suite 3400, San Francisco, CA 94104.

4 14. This Order may be executed and delivered in any number  
5 of counterparts, each of which, when executed and delivered,  
6 shall be deemed to be an original, but such counterparts shall  
7 together constitute one and the same document.

8 IT IS SO AGREED:

9 AMERICAN NATIONAL CAN COMPANY

10  
11 By: 

DATE: 5/5/93

Name: H.A. Johnson

12 Title: Senior Vice President and General Counsel  
13 for S.J. Friesen, Executive Vice President

14 ATLANTIC RICHFIELD COMPANY

15  
16 By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name: \_\_\_\_\_

17 Title: \_\_\_\_\_

18 CHEVRON U.S.A. INC.

19  
20 By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name: \_\_\_\_\_

21 Title: \_\_\_\_\_

22 CONTINENTAL CAN COMPANY, INC.

23 represented by CROWN BEVERAGE PACKAGING, INC.

24  
25 By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name: \_\_\_\_\_

26 Title: \_\_\_\_\_

notice to the Respondents shall be sent to the following address:  
James Meeder, Esq., Beveridge & Diamond, One Sansome Street,  
Suite 3400, San Francisco, CA 94104.

14. This Order may be executed and delivered in any number  
of counterparts, each of which, when executed and delivered,  
shall be deemed to be an original, but such counterparts shall  
together constitute one and the same document.

IT IS SO AGREED:

AMERICAN NATIONAL CAN COMPANY

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

ATLANTIC RICHFIELD COMPANY

By: H.D. White DATE: 4-16-93  
Name: H.D. WHITE  
Title: Attorney-in-Fact

CHEVRON U.S.A. INC.

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

CONTINENTAL CAN COMPANY, INC.  
represented by CROWN BEVERAGE PACKAGING, INC.

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

1 notice to the Respondents shall be sent to the following address:  
2 James Meeder, Esq., Beveridge & Diamond, One Sansome Street,  
3 Suite 3400, San Francisco, CA 94104.

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5 of counterparts, each of which, when executed and delivered,  
6 shall be deemed to be an original, but such counterparts shall  
7 together constitute one and the same document.

8 IT IS SO AGREED:

9 AMERICAN NATIONAL CAN COMPANY

10  
11 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
12 Name:  
13 Title:

14 ATLANTIC RICHFIELD COMPANY

15  
16 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
17 Name:  
18 Title:

19 CHEVRON U.S.A. INC.

20 By: J. N. Stambolis DATE: 4/22/93  
21 Name: J. N. Stambolis  
22 Title: Superfund Team Leader

23 CONTINENTAL CAN COMPANY, INC.  
24 represented by CROWN BEVERAGE PACKAGING, INC.

25 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
26 Name:  
27 Title:

1 notice to the Respondents shall be sent to the following address:  
2 James Meeder, Esq., Beveridge & Diamond, One Sansome Street,  
3 Suite 3400, San Francisco, CA 94104.

4 14. This Order may be executed and delivered in any number  
5 of counterparts, each of which, when executed and delivered,  
6 shall be deemed to be an original, but such counterparts shall  
7 together constitute one and the same document.

8 IT IS SO AGREED:

9 AMERICAN NATIONAL CAN COMPANY

10

11 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
12 Name:  
13 Title:

13

14 ATLANTIC RICHFIELD COMPANY

14

15

16 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
17 Name:  
18 Title:

17

18 CHEVRON U.S.A. INC.

19

20 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
21 Name:  
22 Title:

22

23 CONTINENTAL CAN COMPANY, INC.  
24 represented by CROWN BEVERAGE PACKAGING, INC.

24

25 By: Richard L. Krzyzanowski DATE: 4/5/93  
26 Name: Richard L. Krzyzanowski  
27 Title: Executive Vice President

27

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JVTg

1 THE DOW CHEMICAL COMPANY

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

4 Title:

5

6 MOBIL OIL CORPORATION

7

8 By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

9 Title:

10

NL INDUSTRIES, INC.

11

12

By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

13 Title:

14

PACIFIC GAS & ELECTRIC COMPANY

15

16

By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

17 Title:

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19 SHELL OIL COMPANY

20

21 By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

22 Title

23 SOUTHERN CALIFORNIA GAS COMPANY

24

25 By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

26 Title:

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28

1 THE DOW CHEMICAL COMPANY

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3

By: Terry J. Bane

DATE: 4-7-93

Name:

Title:

5

6

MOBIL OIL CORPORATION

7

8

By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name:

Title:

9

10

NL INDUSTRIES, INC.

11

12

By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name:

Title:

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PACIFIC GAS & ELECTRIC COMPANY

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By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name:

Title:

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SHELL OIL COMPANY

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21

By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name:

Title:

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23

SOUTHERN CALIFORNIA GAS COMPANY

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25

By: \_\_\_\_\_

DATE: \_\_\_\_\_

Name:

Title:

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1 THE DOW CHEMICAL COMPANY

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
4 Name:  
5 Title:

6 MOBIL OIL CORPORATION

7

8 By: J. G. Zabaga DATE: 4-22-93  
9 Name: J. G. Zabaga  
10 Title: Superfund Response Manager

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NL INDUSTRIES, INC.

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

PACIFIC GAS & ELECTRIC COMPANY

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

SHELL OIL COMPANY

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

SOUTHERN CALIFORNIA GAS COMPANY

By: \_\_\_\_\_ DATE: \_\_\_\_\_  
Name:  
Title:

1 THE DOW CHEMICAL COMPANY

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_

4 Name:  
5 Title:

6 MOBIL OIL CORPORATION

7

8 By: \_\_\_\_\_ DATE: \_\_\_\_\_

9 Name:  
10 Title:

11 NL INDUSTRIES, INC.

12

13 By: Janet D. Smith DATE: 4/23/93

14 Name: Janet D. Smith  
15 Title: Associate General Counsel

16 PACIFIC GAS & ELECTRIC COMPANY

17

18 By: \_\_\_\_\_ DATE: \_\_\_\_\_

19 Name:  
20 Title:

21 SHELL OIL COMPANY

22

23 By: \_\_\_\_\_ DATE: \_\_\_\_\_

24 Name:  
25 Title:

26 SOUTHERN CALIFORNIA GAS COMPANY

27

28 By: \_\_\_\_\_ DATE: \_\_\_\_\_

29 Name:  
30 Title:



1 THE DOW CHEMICAL COMPANY

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_

4 Name:  
5 Title:

6

7 MOBIL OIL CORPORATION

8

9 By: \_\_\_\_\_ DATE: \_\_\_\_\_

10 Name:  
11 Title:

12

13 NL INDUSTRIES, INC.

14

15 By: \_\_\_\_\_ DATE: \_\_\_\_\_

16 Name:  
17 Title:

18

19 PACIFIC GAS & ELECTRIC COMPANY

20

21 By:  DATE: 4/21/93

22 Name: Jack J. Wong, Jr.  
23 Title: Manager, Gas Engineering & Environmental Services

24

25 SHELL OIL COMPANY

26

27 By: \_\_\_\_\_ DATE: \_\_\_\_\_

28 Name:  
Title:

29 SOUTHERN CALIFORNIA GAS COMPANY

30

31 By: \_\_\_\_\_ DATE: \_\_\_\_\_

32 Name:  
33 Title:

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35

1 THE DOW CHEMICAL COMPANY

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_

4 Name:

5 Title:

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7 MOBIL OIL CORPORATION

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9 By: \_\_\_\_\_ DATE: \_\_\_\_\_

10 Name:

11 Title:

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13 NL INDUSTRIES, INC.

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15

16 By: \_\_\_\_\_ DATE: \_\_\_\_\_

17 Name:

18 Title:

19

20 PACIFIC GAS & ELECTRIC COMPANY

21

22

23 By: \_\_\_\_\_ DATE: \_\_\_\_\_

24 Name:

25 Title:

26

27 SHELL OIL COMPANY

28

29 By:  \_\_\_\_\_ DATE: 4-16-93

30 Name: E. J. Voiland

31 Title General Manager, E&P California Division

32 SOUTHERN CALIFORNIA GAS COMPANY

33

34 By: \_\_\_\_\_ DATE: \_\_\_\_\_

35 Name:

36 Title:

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1 THE DOW CHEMICAL COMPANY

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
4 Name:  
5 Title:

6

7 MOBIL OIL CORPORATION

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9 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
10 Name:  
11 Title:

12

13 NL INDUSTRIES, INC.

14

15 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
16 Name:  
17 Title:

18

19 PACIFIC GAS & ELECTRIC COMPANY

20

21 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
22 Name:  
23 Title:


24

25 SHELL OIL COMPANY

26

27 By: \_\_\_\_\_ DATE: \_\_\_\_\_  
28 Name:  
Title:

29 SOUTHERN CALIFORNIA GAS COMPANY

30 By:  \_\_\_\_\_ DATE: 04/12/93  
31 Name: Anne S. Smith  
32 Title: Vice President, Environment & Safety

33

34

1 TEXACO, INC.

2

3 By: Harold J. Weiss

DATE: 4/19/93

4

Name: Harold J. Weiss

Title: Manager - CWSM

5

6 TRI-VALLEY GROWERS

7

8 By: \_\_\_\_\_

DATE: \_\_\_\_\_

9 Name: \_\_\_\_\_

Title: \_\_\_\_\_

10 The above being agreed and consented to, IT IS SO ORDERED

11 this \_\_\_\_\_ day of \_\_\_\_\_, 1993.

12 U.S. ENVIRONMENTAL PROTECTION AGENCY

13

By: \_\_\_\_\_

14 Jeffrey Zelikson, Director  
15 Hazardous Waste Management Division  
Region IX

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1 TEXACO, INC.

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_

4 Name:  
5 Title:

6

6 TRI-VALLEY GROWERS

7

8 By:  DATE: 4/21/93

9 Name: Richard D. Dickson  
9 Title: Executive Vice President

10 Tri Valley Growers Container Division  
10 The above being agreed and consented to, IT IS SO ORDERED

11 this \_\_\_\_\_ day of \_\_\_\_\_, 1993.

12 U.S. ENVIRONMENTAL PROTECTION AGENCY

13

14 By: \_\_\_\_\_  
14 Jeffrey Zelikson, Director  
15 Hazardous Waste Management Division  
15 Region IX

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1 TEXACO, INC.

2

3 By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

4 Title:

5

6 TRI-VALLEY GROWERS

7

8 By: \_\_\_\_\_ DATE: \_\_\_\_\_

Name:

9 Title:

10 The above being agreed and consented to, IT IS SO ORDERED

11 this 2nd day of June, 1993.

12 U.S. ENVIRONMENTAL PROTECTION AGENCY

13

14 By: James Kipstein for  
Jeffrey Zelikson, Director  
Hazardous Waste Management Division  
15 Region IX

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